

# Issues, Resources, and Alternatives Considered but Not Carried Forward

## 3.1 Issues and Resources

In September 2020, a [notice of proposed action \(NOPA\)](#) was mailed to 92 community residents, interested individuals, public agencies, tribal governments, and other organizations. This notice was specifically designed to elicit comments, concerns, and issues pertaining to the proposed action. A legal notice was published on September 1, 2020 in the *Coloradoan*, the newspaper of record for the Arapaho and Roosevelt National Forests and Pawnee National Grassland (ARP), announcing the opportunity to comment on the proposed action. The comment period closed on October 1, 2020. In response to the Forest Service’s solicitations for public comments, 5 letters were received.

From these letters, 6 substantive comments were extracted and categorized by resource area. The Forest Service identified specific areas of concern and classified them as either “*issues*” or “*non-issues*.” Substantive comments are addressed in a *Response to Comments* document located on the [project webpage](#) in the project file. The Forest Service considered the information gathered through public scoping along with the input of the Forest Service Interdisciplinary Team (ID Team) in identifying specific resources that require in-depth analysis in **Chapter 3** of this EA.

*Issues may warrant the generation of an alternative, can be addressed by project design criteria or mitigation, or generally require in-depth analysis and disclosure.*

*Non-issues are beyond the scope of the project, are already decided by law, regulation or policy, or are not relevant to the decision.*

Resources carried forward for analysis are described in Chapter 1 of the EA. **Table 1** describes the resources and issues that were not carried forward.

**Table 1. Issues and Resources Not Carried Forward**

Resource Area	Rationale
Botany	<p>A Botanical Biological Assessment and Biological Evaluation has been prepared specifically for this project and is located on the <a href="#">project webpage</a> in the project file. No federally listed or proposed plant species are known or suspected to occur with the project area. Therefore, federally listed plant species were dismissed from detailed analysis in the EA.</p> <p>In addition, 16 Region 2 sensitive plant species were determined to contain suitable habitat within the project area. 14 of these species were not located during comprehensive field reconnaissance and hence they are presumed to be absent from the Analysis Area. Although no new occurrences of the two remaining Forest Service sensitive moonworts (<i>Botrychium ascendens</i>, <i>B. paradoxum</i>) were found during the field surveys, there is potential habitat which is currently occupied by more common moonworts. Because Forest Service Sensitive <i>Botrychium</i> spp. occur in mixed species aggregations and may not emerge every year, there is a remote possibility that they could be present, and consequently, of direct and/or indirect effects to these species.</p> <p>It is anticipated that the direct and indirect impacts associated with the proposed action would be localized and not of sufficient intensity or scale to cause a significant effect. A determination of May adversely impact individuals, but not likely to result in a loss of viability in the Planning Area, nor cause a trend toward federal listing is warranted for <i>Botrychium ascendens</i> and <i>B. paradoxum</i>. Therefore, botanical resources have been dismissed from detailed analysis in the EA. A detailed analysis of the potential direct and/or indirect effects to these species is included</p>

Resource Area	Rationale
	in the Botanical Biological Assessment and Biological Evaluation on the <a href="#">project webpage</a> in the project file.
<b>Cultural</b>	A Cultural Resource Survey has been prepared specifically for this project and is located on the <a href="#">project webpage</a> in the project file. An inventory of Previously recorded cultural resources within one mile of the area of potential effect (APE) identified three isolated finds and two linear sites. All of the nearby cultural resources were either recommended or determined not eligible for listing on the National Register of Historic Places (NRHP). A field survey was conducted to identify, record, and evaluate the NRHP eligibility of any cultural resources located within the APE and identify potential adverse affects. No isolated finds were identified during the inventory. The mapped area of previously recorded isolated finds was intensively searched, but the original isolated find was not relocated and no other cultural material was determined to be present in the APE. Furthermore, the subsurface potential of the APE is low because sediments derived from glacial till and slope alluvium are not conducive to substantial burial of cultural resources. Therefore, cultural resources have been dismissed from detailed analysis in the EA.
<b>Air Quality</b>	<p>The only Class I airshed in proximity to the project area is the Eagles Nest Wilderness, located approximately 9 miles southwest of the Loveland SUP area. In addition, the following Class II airsheds are located less than 10 miles from the Loveland SUP area: Ptarmigan peak Wilderness, Mount Evans Wilderness, and James Peak Wilderness. Because average wind direction as measured at Loveland is predominantly from the west, it is unlikely that any emissions generated directly or indirectly by Loveland's operations currently affect these airsheds. The Mount Evans Wilderness is located southeast of ski area; however, as an exposed feature located at high elevation where winds can be strong, air emissions at Loveland are generally readily dispersed. Furthermore, the majority of emissions associated with the ski area occur during daytime hours when down-valley drainage is least common. Due to its location, topography, hours of heaviest operation, and common meteorological conditions, emissions from Loveland are unlikely to contribute to air quality problems in nearby Class I or II areas.</p> <p>Furthermore, the use of heavy machinery during construction may impact local air quality through the generation of fugitive dust; however, implementation of PDC would reduce any potential impacts to negligible levels. Lastly, as the proposed action would result in negligible increases in traffic (refer to Section 3.6.2), the associated vehicular emissions are also anticipated to be negligible.</p>
<b>Social and Economic</b>	The proposed action is not anticipated to create any additional full-time equivalent positions, nor is it anticipated to create any impacts to social resources within the Clear Creek County community (housing, county services, school systems, etc.). The proposed action would have short-term economic impacts due to construction related activities. Lastly, the project would have negligible long-term economic impacts in the context of the overall economic area (Clear Creek County) as a result of negligible increases in visitation to Loveland (refer to Section 3.6.2 of the EA). As the proposed action would have minimal impacts on social and economic resources in Clear Creek County, it has been dismissed from detailed analysis in the EA.
<b>Environmental Justice</b>	The proposed action would not disproportionately affect low income or minority populations and would not change the ability of the public to access recreational opportunities on public land within or adjacent to the ski area.
<b>Noise</b>	The proposed action would introduce noise both during the construction phase (e.g., noise from construction equipment) as well as during the operation phase (e.g., operation of the proposed parking lot). Noise during construction would be temporary. Noise conditions during the operation phase would be similar to existing conditions in the surrounding areas within the Loveland SUP area.
<b>Floodplains</b>	The proposed action is not within a designated floodplain. The action alternatives do not include structural siting or development within a floodplain. Floodplains, as defined in Executive Order 11988, would not be affected by the proposed action.
<b>Inventoried Roadless Areas</b>	The proposed action is not located within an Inventoried Roadless Area.

## 3.2 Alternatives

### 3.2.1 Alternatives Considered but Eliminated from Detailed Analysis

The range of alternatives considered by the responsible official includes the proposed action analyzed in this document, as well as other alternatives eliminated from detailed analysis. The [Forest Service Handbook 1909.15](#) states:

*“Alternatives not considered in detail may include, but are not limited to, those that fail to meet the purpose and need, are technologically infeasible or illegal, or would result in unreasonable environmental harm.”<sup>1</sup> (USDA Forest Service 2013)”*

These alternatives considered but eliminated from detailed analysis are briefly described in the following paragraphs.

#### No Action Alternative

The no action alternative provides a baseline for comparing the effects of the action alternatives. The no action alternative essentially reflects a continuation of existing management practices without changes, additions, or upgrades. No new facilities or recreational opportunities would be approved under the no action alternative. In accordance with [Forest Service Handbook 1909.15](#), Chapter 40, Section 41.22, and [36 CFR § 220.7\(b\)\(2\)\(ii\)](#) the EA will not include an analysis of the no action alternative. The [Forest Service Handbook 1909.15](#) states:

*“A stand-alone no-action alternative is not required. However, the effect of taking no action should correlate closely with the purpose and need. In other words, the effects of not taking action should provide a compelling reason for taking action and, therefore, should be consistent with the purpose and need for action. (USDA Forest Service 2013)”<sup>2</sup>*

As articulated in Chapter 1 of the EA, the purpose of the proposed parking project is to increase the parking capacity of the Loveland Valley base area to better accommodate existing and future guest visitation at Loveland. The proposed parking project is needed to respond a current deficit of approximately 529 parking spaces needed to properly accommodate the current and anticipated visitation levels, as identified in the 2017 Master Development Plan Update. In addition, the purpose of the proposed terrain improvement project is to improve utilization of existing lift-served terrain accessed by Chair 3 within this area of the mountain. The need of the proposed trail improvement project is to reduce the grade of trails in the Chair 3 terrain pod, which currently includes trail segments that are too steep and off fall-line for novice ability level skiers. The project is also needed to increase opportunities for beginners.

Without implementation of the proposed action, Loveland would not be able to address existing shortcomings associated with the deficit of parking spaces and the lift-served terrain accessed by Chair 3; therefore, the No Action Alternative is not discussed further in the EA.

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<sup>1</sup> USDA Forest Service. 2013. Forest Service Handbook 1909.15. National Headquarters. Washington, DC.

<sup>2</sup> Ibid.

### Alternative Parking Lot Configuration

The initial design of the proposed action included a parking configuration with two small parking lots rather than one large parking lot as currently proposed. While the original parking configuration adequately served the purpose and need of the proposed action, portions of the proposed parking lots would have been located within a complex of wetlands. Additional planning resulted in the development of an alternative to construct one large parking which would reduce direct wetland impacts from less than one acre to less than one tenth of an acre. Therefore, the original parking configuration was dismissed from detailed analysis in the EA.

### Alternative Alignment of Boomerang Trail

The initial design of the proposed action included an alternative alignment of the *Boomerang* ski trail, which featured additional tree clearing for another connector trail between *Boomerang* and *Zig Zag*. While the original alignment would have provided an additional trail option for novice ability level skiers, the proposed connector trail would have been located within a small creek drainage. To avoid impacts to the drainage, the proposed connector trail was removed from the proposed action. Therefore, the alternative alignment of *Boomerang* ski trail was dismissed from detailed analysis in the EA.